REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion is respectfully requested.

Claims 1-3, 5-114 and 16-21 are pending in this application. Claims 1, 11 and 16 are amended. Support for amended independent Claims 1 and 11 can be found in the original specification, claims and drawings.[1] No new matter is presented.

In the outstanding Office Action, Claims 1-21 were rejected under 35 U.S.C. 102(e) as being anticipated by Foladare et al (U.S. Patent No. 5,905,777, herein "Foladare"). Applicants respectfully traverse this rejection.

Amended independent Claim 1 recites, a device in a communication network having multiple sub-networks, where each of the sub-networks includes services that may be different from that of other sub-networks, comprising, *inter alia*;

> ...wherein *said service request is a request to initiate a conference connection, and the information processor is configured to communicate with at least one of the plurality of sub-networks to automatically establish the requested conference connection.*

Support for the above emphasized "conference connection" feature can be found at p. 9, lines 2-10 of the specification.

Independent Claim 11, while directed to an alternative embodiment, is amended to recite substantially similar features. Accordingly, the remarks presented below are applicable to each of independent Claims 1 and 11.

Turning to the applied reference, Foladare discloses a communication system including an E-mail server and an E-mail network, in which useful E-Mail messages can be identified, separated from junk mail, and forwarded as directed by the recipient.[2]

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[1] e.g., specification, p. 9, lines 2-10.
[2] See Foladare in the Abstract.

Foladare, however, fails to teach or suggest accepting a service request, which *is a request to initiate a conference connection, and the information processor is configured to communicate with at least one of the plurality of sub-networks to automatically establish the requested conference connection*" as recited in independent Claim 1.

In contrast, as noted above, Foladare allows a user to create database setting indicating whether a received e-mail is important enough for a user to receive an immediate notification of receipt. Once the user receives an indication that an e-mail is received, which fits into a predetermined category of importance, the user is then able to send a signal back to the system requesting that the e-mail be forwarded to a selected destination (see col. 5, lines 15-38). Thus, Foladare fails to teach or suggest receiving a request to initiate a *conference connection* and *automatically establishing the requested conference connection*, as recited in amended independent Claim 1.

Further, Foladare fails to teach or suggest an information database configured to identify the different services associated with the sub-networks, *the different services including protocol translations required to provide the requested service* (i.e., conference connection), ... wherein the information processor is further configured to retrieve sub-networks available to provide the requested service (i.e., conference connection) *based on the different services identified from the database*, as recited in independent Claim 1.

The Final Office Action indicates that Applicants' previously filed remarks, concerning the protocol translations recited in independent Claim 1, were not persuasive because, with respect to Foladare, it is "inherent to have protocol translations in order to provide for a data message from a computer to be translated for a fax, pager..."

However, as noted above, independent Claim 1 is not directed only to protocol translation, but further recites a specific relationship between an information database configured to identify the different services associated with the sub-networks, *the different*

services including protocol translations required to provide the requested service (i.e.,
conference connection), ... and the information processor which is further configured to
retrieve sub-networks available to provide the requested service (i.e., conference connection)
based on the different services identified from the database. Thus, the protocol translation
services are identified in the database, then the information processor retrieves a sub-network
available to provide the translation based on the database information.

In contrast, Foladare describes that the E-Mail server receives an E-Mail message and
then accesses the recipient's record from the database 62.[3] In addition, Foladare's step 406
determines if the sender ID 233 in the received message 239 matches any of the senders in
the sender list 252 of the recipient's record.[4] Thus, the information stored in the database 62
of Foladare does not identify different services associated with the sub-networks, with each
service *including protocol translations required to provide the requested service* (i.e.,
conference connection), as recited in independent Claim 1. Specifically, the database of
Foladare does not identify protocol translation services, whatsoever. Instead, the database of
Foladare simply stores user profile information, which can <u>not</u> reasonably considered as data
that identifies a protocol translation service associated with a sub-network.

Further, "[i]n relying upon the theory of inherency, the Examiner must provide a basis
in fact and/or technical reasoning to reasonable support the determination of the allegedly
inherent characteristic <u>necessarily</u> flow from the teachings of the applied prior art." *See* Ex
parte Levy, 17 USPQ2d 1461, at 1464 (Bd. Pat. App. & Inter. 1990) and M.P.E.P. § 2112.

As discussed above, simply because the device of Foladare may be capable of sending
messages to facsimile or printing devices, it does not <u>necessarily</u> follow from these teachings
that Foladare includes a database identifying different services associated with the sub-

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[3] See Foladare at column 4, lines 55-64, and in Figures 2 and 4.
[4] See Foladare from column 4, line 65 to column 5, line 10.

networks, each service *including protocol translations required to provide the requested*

service (i.e., conference connection), as recited in independent Claim 1.

Independent Claim 1 further recites that "the information processor is further

configured to retrieve sub-networks available to provide the requested service (i.e.,

conference connection) *based on the different services identified from the database*."

In addressing this claimed feature, the Official Action cites Fig. 1 of Foladare.

However, Fig. 1 simply shows a conventional network structure, and does not teach or

suggest retrieving sub-networks available to provide the requested service (i.e., conference

connection) *based on the different services identified from the database*, as recited in

independent Claim 1. As noted above, the Official Action relies on database 62 of Foladare

to address the database feature recited in the claims. Foldare's database, however, simply

stores user profile and forwarding information, and does not facilitate retrieving sub-networks

available to provide the requested service (i.e., conference connection) *based on the different*

services identified from the database, as recited in independent Claim 1.

Therefore, the applied reference fails to teach or suggest every feature recited in

Applicants' claims, so that Claims 1-3, 5-14 and 16-21 are patentably distinct over Foladare.

Accordingly, Applicants respectfully traverse, and request reconsideration of, the rejection
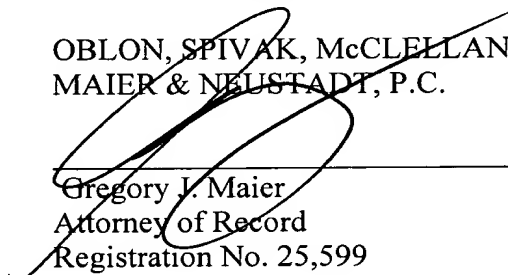
based on Foladare.

Consequently, in view of the present Amendment, no further issues are believed to be outstanding in the present application, and the present application is believed to be in condition for formal Allowance. A Notice of Allowance for Claims 1-3, 5-14 and 16-21 is earnestly solicited.

Should the Examiner deem that any further action is necessary to place this application in even better form for allowance, the Examiner is encouraged to contact Applicants' undersigned representative at the below listed telephone number.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.

Gregory J. Maier
Attorney of Record
Registration No. 25,599

Customer Number

22850

Tel: (703) 413-3000
Fax: (703) 413 -2220
(OSMMN 06/04)

Andrew T. Harry
Registration No. 56,959

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